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September 16, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Dear Ms. Dortch:

My company, Midcoast Internet Solutions, provides fixed wireless broadband service on the coast of Maine. We rely primarily on unlicensed spectrum to deliver broadband services to consumers that lack broadband choices. We built our network from scratch using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices. Thanks to the Commission's initiatives, consumers in our service area can now get broadband service. We were one of the first companies on the east coast providing broadband via wireless; since around 1997! We are still meeting and exceeding demand for broadband and pioneering new areas of service.

Midcoast Internet Solutions is very interested in utilizing television white spaces so that we can improve service. Being in the "Pine tree state", we have to deal with many trees that block normal and economical line-of-sight microwave equipment. 900Mhz equipment has been our only option so far, but it is not nearly enough spectrum for multiple service providers. It also sometimes receives interference from cordless phones and consumer products. We are committed to deploying TVWS as soon as equipment for point-to-multipoint service is commercially available.

I am pleased that the FCC will be acting on TV white space petitions for reconsideration in the near future. There are several proposals that would help us to deploy service:

First, the FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. Higher base station height combined with some downtilt could improve signals and service quality for customers and prevent the needless reception or transmission of interference due to the intentional coverage design and antenna choice. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

Second, we believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a higher modulation and permit more data to be transmitted over the same point-to-multipoint network.

Third, we are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal. I won't waste too many words on this, but it is very important. The licensed TVWS backhaul ideas

proposed by FiberTower are an extremely wasteful use of spectrum and it provides less of a benefit to the public than even previous or existing use of TVWS spectrum. Their costs comparisons justifying their rationale are not realistic. Almost every tower has line-of-sight to somewhere, permitting the use of existing microwave backhaul options. The towers that don't have line-of-sight somewhere could be served with a T1 or fiber based service. Various ARRA projects are increasing the availability of fiber and making the FiberTower proposal less relevant. FiberTower seems to be trying to compete against these mature higher margin carrier services rather than serve an unmet need.

Wireless ISPs, however, exist to serve unmet needs. We look forward to changes that permit the commercial availability of equipment for TVWS that WISPs can use. There remains a great need for broadband that can't be technically or cost effectively satisfied with existing unlicensed frequencies.

Sincerely,

A handwritten signature in black ink, appearing to read "Jason Philbrook". The signature is fluid and cursive, with the first name "Jason" and last name "Philbrook" clearly distinguishable.

Jason Philbrook
President, Midcoast Internet Solutions